



**National Park Service
U.S. Department of the Interior
Valles Caldera National Preserve
Jemez Springs, New Mexico**

**FINDING OF NO SIGNIFICANT IMPACT
REPLACE STORAGE CONTAINERS AND SHED WITH GARAGE/MAINTENANCE
BUILDING FOR ELECTRIC-VEHICLE SHUTTLE VANS**

Recommended:

26 April, 2018

Robert R. Parmenter
Acting Superintendent, Valles Caldera National Preserve

Date

Approved:

5/18/18

Sue E. Masica
Regional Director, Intermountain Region, National Park Service

Date

INTRODUCTION

In compliance with the National Environmental Policy Act (NEPA), the National Park Service (NPS) prepared an Environmental Assessment (EA) to examine alternative actions and environmental impacts associated with the proposed project to replace three storage containers and a shed with a new garage/maintenance facility for the Preserve's all-electric shuttle vans. The project is needed to re-charge, protect and service the shuttle vans, and provide indoor workspace for maintenance personnel.

The statements and conclusions reached in this finding of no significant impact (FONSI) are based on documentation and analysis provided in the EA and associated decision file. To the extent necessary, relevant sections of the EA are incorporated by reference below.

SELECTED ALTERNATIVE AND RATIONALE FOR THE DECISION

Selected Alternative

Based on the analysis presented in the EA, NPS selected Alternative B – Garage Construction in Cabin District Maintenance Area. The selected alternative will construct the garage with a maintenance/workshop area to support shuttle van maintenance and minor day-to-day repairs, and will be constructed on a previously disturbed site in the existing maintenance area of the Cabin District. The new single-story structure will be a pre-fab metal building with non-descript dark exterior finishes to neutralize the visual impact, compliment the surrounding area buildings and blend in with the surrounding landscape. The new structure will comply with the Architectural Barriers Act Accessibility Standard and follow sustainable building practices. Three existing storage containers and a welding shed currently occupy the site. One storage container and the welding shed will be demolished and removed, while the other two containers will be removed from the site and stored offsite at the Union building. The Union building is a non-historic facility within the existing Preserve boundaries, and is currently used for equipment and material storage; this site offers adequate space for placement of the storage containers next to an existing storage shed on a graded pad. Some small trees and 2 hazard-tree snags will be removed during construction. An existing access road to the site will be improved. In addition, the project will implement a number of resource protection measures to minimize the degree and/or severity of effects on wildlife and species of concern, vegetation, soils, cultural resources, visitor use and experience, air quality and soundscapes, night lighting, and public health, safety, and park operations.

Rationale

Alternative B was selected because it best meets the project purpose to:

- Provide safe, indoor space for maintenance workers.
- Provide shelter for shuttle vans and indoor electric recharging stations.

FINDING OF NO SIGNIFICANT IMPACT

CEQ regulations at 40 CFR section 1508.27 identify ten criteria for determining whether the selected alternative will have a significant effect on the human environment. The NPS reviewed each of these criteria given the environmental impact described in the EA and determined there will be no significant direct, indirect or cumulative impact under any of the criteria.

The following impact topics were dismissed because they did not warrant a full analysis: Soils and vegetation, water and hydrology, general wildlife, state-listed wildlife and migratory birds of conservation concern, Federal special status species, air quality, soundscapes, lightscales, paleontological resources, archaeological resources, cultural landscapes, ethnographic resources, socioeconomics, environmental justice, Indian Trust Resources, Indian sacred sites, and visitor use and experience.

As described in the EA, the selected alternative has the potential for adverse impact on the Baca Ranch Cabins Historic District; however, no potential significant adverse impact was identified. The overall visual impact of the project will be reduced by the placement of the garage behind the other buildings in the district and in a location surrounded by existing trees. The impact will be further reduced by the choice of building materials and design that are compatible with the design, association and feeling of the potential district. The septic system and utility lines will all be underground and out of sight; trench-lines will revegetate with herbaceous vegetation within several years and blend in with natural vegetation, and running underground utility lines mostly within existing trench-lines minimizes new areas of disturbance within the landscape of the district. The construction of the garage adjacent to other structures built for storage and maintenance activities will be consistent with the historic use of the area. The proposed garage will not physically alter any contributing feature or cabin in the potential district. Removal of the 10 small trees and 2 snags on the construction site will not alter the structure, functioning, and the feeling of a forested area. The visual change will not be obvious to the public from the Bond Cabin and other public-access areas along the VC02 road, as other existing trees will mostly screen the project area from view. The project will introduce non-historic audible impacts during garage construction and utility line trenching. Permanent non-historic audible impacts are not expected to differ much from what has occurred in the past. Due to the location and design of the garage, the project will not affect the historical significance of the district, nor change the eligibility of the potential district to be listed on the National Register of Historic Places. In a consultation letter dated May 12, 2017, the NM SHPO stated "[t]he proposed garage, in our view, would fit well in its proposed location [Alternative B] far behind the row of cabins." In a follow-up letter dated November 27, 2017, the NM SHPO further stated it "has no concerns regarding the proposed location or design of the Electric Van Shuttle Garage. The materials and design reflect our earlier recommendations and would minimize impacts to the proposed Baca Ranch Cabin Historic District."

Best management practices and mitigation measures stated in the FONSI (Appendix A) will be implemented to minimize the subsequent effects resulting from the selected alternative. The project will not result in the loss or destruction of significant scientific, cultural, or historical resources, nor will there be any significant impacts on public health, public safety, or unique characteristics of the region. No highly uncertain or controversial impact, unique or unknown risks, significant cumulative effects, or element of precedence were identified. Implementation of the NPS selected alternative will not violate any federal, state or local environmental protection laws.

CONCLUSION

As described above, the selected alternative does not constitute an action meeting the criteria that normally requires preparation of an environmental impact statement (EIS). The selected alternative will not have a significant effect on the human environment in accordance with Section 102(2)(c) of NEPA. Based on the foregoing, it has been determined that an EIS is not required for this project and, thus, will not be prepared.

APPENDIX A. MITIGATION MEASURES

The following mitigation measures will minimize the degree and/or extent of the adverse impacts and will be implemented during the project.

Wildlife

- Construction personnel will be oriented on appropriate behavior in the presence of wildlife and on proper storage and handling of food, garbage and other attractants.
- Trenches will be kept open for the minimal amount of time, and provided with escape ramps for small wildlife as per recommendations provided by the New Mexico Department of Game and Fish; trenches will be checked daily and any wildlife found will be rescued and released. Trenching will occur during summer monsoon months of the year to allow for pre-construction surveys and simultaneous monitoring during construction for the Jemez Mountains salamander and moving any observed individuals to safe habitats outside the construction area.
- Construction will not occur in mid-May or June, therefore avoiding elk calving and bird nesting seasons.
- The construction site and staging areas will be monitored by NPS natural resource staff for all compliance requirements related to special status species.

Vegetation

- Non-native invasive plant infestations near the disturbed areas will continue to be treated on a yearly basis, with emphasis on these areas for a minimum of three years following project completion. These treatments, including hand-pulling of invasive plants and use of herbicides, have been previously approved in a 2014 Environmental Impact Statement for landscape restoration within the Preserve.
- Construction equipment will be cleaned before entering the Preserve to minimize the transportation of exotic seeds to the site. All equipment entering the Preserve will be inspected and may be required to be pressure washed to remove foreign soil, vegetation, and other materials that may contain non-native seeds or vegetation.
- Existing vegetation will likely be sufficient to screen the new building, but additional plantings of native tree and shrub species will be used if more vegetation is deemed necessary.

Soils

- Erosion control measures that provide for soil stability and prevent movement of soils will be implemented, such as installing erosion control wattles along the edge of construction. Wattles will be made of weed-free materials.
- Any topsoil temporarily disturbed during construction will be aerated and reseeded with native vegetation.

Cultural Resources and Historic Structures

In consultation with the New Mexico State Historic Preservation Officer (NMSHPO) through a Memorandum of Agreement (MOA), the project will mitigate the impact on sub-surface archaeological resources by:

A. *Subsurface Information Recovery & Monitoring During Construction Phases.* The NPS archaeologist(s) will monitor ground disturbing activities during the initial subsurface ground disturbance caused by heavy equipment in any and all areas of LA140252 where intact deposits are anticipated based on prior archaeological reconnaissance and testing. In the event of unanticipated archaeological resources, including significant intact cultural feature(s), NPS archaeologists will conduct documentation and will determine whether work in the area must cease until additional treatment can be determined in consultation with SHPO (see Stipulation V). In addition to monitoring, the NPS archaeologist(s) will document soil profiles in construction trenches during construction excavation to gather information on subsurface soils and stratigraphy, geomorphology, natural and cultural disturbances, and other geomorphologic processes. The NPS and any construction contractors will facilitate this information recovery.

B. *Shovel Probe Grid.* The Preserve has previously conducted shovel probing that includes a grid of 152 shovel probes, spaced at 20 m intervals, that covers the APE and extends beyond it across roughly 40% of the surrounding potential historic district. The NPS shall expand this grid by at least 100 probes. This will improve understanding of the extent and nature of subsurface cultural deposits in the area, both inside and outside the APE and LA140252.

C. *Sites Data Synthesis.* The NPS shall review and synthesize all data that has been collected to date relating to previously identified prehistoric sites and cultural materials in the Preserve front country area. This comprehensive summary will serve as a pilot project for a future Preserve-wide site significance standards document.

D. *Investment in Non-collection Instrument(s).* The NPS will acquire in-field instrumentation to support enhanced information recovery during pedestrian survey, and to maximize the information potential of collections made during previous survey, testing, and data recovery efforts at the Preserve. The expectation is that this instrument will be a high-quality portable X-ray fluorescence (pXRF) instrument (such as a Bruker Tracer series, or equivalent).

E. *Post-review discoveries.* If previously unknown cultural resources are discovered during construction, work will stop in the immediate vicinity, the resource protected and the SHPO and American Indian tribe or tribes that might attach traditional cultural and religious importance to the resource will be notified within 24 hours of the discovery. If, in consultation with the SHPO, it is determined that the resource is significant and warrants preservation or treatment, the location of the cultural resource will be documented. Every attempt will be made to avoid the discovery by construction, but if it cannot be avoided, the NPS will consult with the American Indian tribe or tribes and SHPO to develop a mitigation plan to mitigate the effects of the undertaking on the historic property. The SHPO and the Indian tribe or tribes will have 30 days to review and provide comment on the proposed plan. NPS will take all comments into consideration and revise the plan as necessary. A revised plan will be provided to SHPO and the Indian Tribe or tribes. In the event that human remains are encountered during implementation of the undertaking all work will cease until a determination of cultural affiliation is made and the appropriate American Indian tribe or tribes have been contacted. Work will not resume in the area of discovery until a human remains treatment plan has been completed by the NPS in consultation with the appropriate American Indian tribe or tribes and the SHPO.

In addition to above mitigations, the following additional best management practices will be incorporated into the project for Cultural Resources:

- Based on recommendations in a consultation letter from the NM SHPO dated May 12, 2017, the color and reflectivity of the garage will be selected to reduce its visibility on the landscape.
- Existing healthy trees will be retained to maintain visual shielding of the garage from the surrounding buildings, especially to the southeast (i.e., toward the Valle Grande).
- If concealed cultural resources are encountered during project activities, all necessary steps will be taken to protect them and the NPS project leader will be notified immediately. Work will cease where the resources are found. At the direction of NPS cultural resources staff, the resources may be covered or stabilized until assessments and/or consultation can be conducted.
- All ground-disturbing work will be monitored by on-site personnel meeting the Secretary of the Interior Standards for Archaeology.
- In the unlikely event that human remains are discovered during construction, provisions outlined in the Native American Graves Protection and Repatriation Act (1990) will be followed.
- The NPS will ensure that all contractors and subcontractors are informed of the prohibition on collecting artifacts or intentionally damaging archaeological sites or historic properties.
- All excavation and construction activities will be undertaken a minimum of 15 ft., or as indicated in the field, from any existing historic structure, to avoid inadvertent damage to other structures.

Visitor Use and Experience

- Signs will be posted and a press release issued to inform visitors when construction is initiated.
- An NPS contractor will be used to implement the new shuttle van garage project. Per NPS and OSHA regulation, construction zones will be identified and clearly marked. All safety protection measures will be clearly stated in the NPS construction agreement. Workers will be instructed to avoid conducting activities beyond the construction zone as defined by the construction zone fencing.
- Public access to all construction sites will be restricted.
- Construction work will not be permitted on weekends and other high visitation days (e.g. holidays).

Air Quality and Soundscapes

- Fugitive dust generated by construction will be controlled by spraying water on the construction site if needed.

- All motor vehicles and equipment will have mufflers conforming to original manufacturer specifications; equipment will be in good working order to prevent excessive or unusual noise, fumes, or smoke.
- Equipment will not be allowed to idle longer than two minutes when not in use.
- No engine brakes ("Jake Brakes") will be used on Preserve roads.

Park Operations

- The NPS will develop and implement emergency response protocols for the project. Construction activities will be conducted in accordance with established safety protocols.
- Employees and construction crews will be required to park their vehicles in established staging areas as determined by the NPS in consultation with NPS cultural and natural resources staff; if out of walking distance, crews will be shuttled to and from the project site.
- Construction workers and supervisors will be informed about the special sensitivity of the Preserve's values, regulations, and appropriate activities while construction is underway.

**ERRATUM AND RESPONSE TO
SUBSTANTIVE PUBLIC COMMENTS
REPLACE STORAGE CONTAINERS AND SHED WITH
GARAGE/MAINTENANCE BUILDING FOR ELECTRIC-VEHICLE
SHUTTLE VANS
ENVIRONMENTAL ASSESSMENT
VALLES CALDERA NATIONAL PRESERVE
APRIL, 2018**

The following erratum and response to substantive public comments, together with the Finding of No Significant Impact (FONSI) and the Environmental Assessment (EA), describe the final decision of the National Park Service for the Valles Caldera National Preserve's project to Replace Storage Containers And Shed With Garage/Maintenance Building For Electric-Vehicle Shuttle Vans.

ERRATUM

This erratum is to be attached to the Replace Storage Containers And Shed With Garage/Maintenance Building For Electric-Vehicle Shuttle Vans EA dated April 2018, and is intended to update a statement in the EA.

Archaeological Resources. Page 11: Replace current text with revised text.

Current Text:

The Valles Caldera is currently consulting with NM SHPO to develop a Memorandum of Agreement that resolves this project's adverse effect on LA140252.

Revised Text:

The Valles Caldera has consulted with NM SHPO and developed a Memorandum of Agreement (MOA) that resolves this project's adverse effect on LA140252. The mitigations in the MOA are listed above in this FONSI on Page 5.

RESPONSE TO SUBSTANTIVE PUBLIC COMMENTS

PEPC PROJECT ID# 71471

Comment #1

Commenter discussed concerns about potential poisoning or destroying rodents and secondary effects to food chain. Suggested alternative method to prevent shuttle van damage from rodents by sprinkling cayenne pepper across all electrical components in vehicles.

RESPONSE: Poisoning of rodents or any other wildlife on Valles Caldera National Preserve (VALL) was not proposed, nor is it part of any NPS policy on VALL. One outcome of keeping the shuttles in the garage is that they will be protected from rodents, avoiding any conflicts with rodents. Dusting all electrical components of the electric shuttle vans with cayenne pepper will void the vehicle warranty, and will be logistically infeasible as technicians cannot easily access all the electrical components without dis-assembling significant parts of the shuttle on a routine basis; also, cayenne pepper treatments to vehicle engines is not a scientifically-proven treatment, and is not authorized by GSA for any other government-owned vehicles.

Comment #2

Commenter is concerned about the impact of project on archaeological lithic scatters.

RESPONSE: As noted on page 11 of the EA, archaeological resources in this area are mostly already disturbed by previous construction activities under private ownership in the 20th Century. NPS cultural resources staff have sampled the archaeological resources, and developed a Memorandum of Agreement with the New Mexico State Historic Preservation Officer to mitigate the impacts of the construction activities (see Appendix A, page 5).

Comment #3

Commenter is concerned that the leach field associated with the septic system has unidentified impacts. Would an impact affect the salamanders that are a special species of concern in this assessment? Was an alternative system ever considered?

RESPONSE: While no salamanders have been detected in the project area, the leach field comprises a very small portion of potential salamander habitat in the larger region and would cause minimal displacement. The US Fish & Wildlife Service has reviewed the project, including potential impacts of the septic system and effluent, and determined that the projects "may affect, is not likely to adversely affect, the Jemez Mountains salamander." Regarding an alternative system to a septic tank and drain field, because a community sewage treatment system is not available, the septic system is the only option for treating waste sewage in this area.

Comment #4

Commenter requested additional information on use of shuttles on the Preserve.

RESPONSE: The shuttle plan and Department of Transportation grant that funded the shuttles, the PV system and the garage was initiated under the USDA Valles Caldera Trust (hereafter, "Trust"), and shuttle vans were analyzed in the Environmental Impact Statement for the Trust for the Public Access and Use Plan and were part of the alternative selected in the Record of Decision, Dec. 5, 2012.

Comment #5

Commenter requested information on shuttle routes and schedules, and asked if these were considered under cumulative effects.

RESPONSE: The routes of the shuttles vary by season and event, and will likely change in the future to meet public needs; currently, the shuttles transport visitors from the Entrance Station to the Cabin District and back. However, the routes and schedules themselves are outside the scope of this EA, which focuses on garage construction. In addition, the decision to use shuttles was analyzed in the Public Access and Use Plan EIS (Oct. 15, 2012; Record of Decision Dec. 5, 2012).

Comment #6

Commenter is concerned that shuttle activity will increase visitation in the Cabin District.

RESPONSE: Shuttle use is outside the scope of this EA, which focuses on garage construction. The decision to use shuttles was analyzed in the Public Access and Use Plan EIS (Oct. 15, 2012; Record of Decision Dec. 5, 2012).

Comment #7

Commenter is concerned about constructing a septic system in the Cabin District, in view of the statement in the previous Valles Caldera Trust document (PAUP EIS page 2-81) that the water table in the headquarters area is "very high, making treatment of wastewater difficult."

RESPONSE: Septic systems are specifically designed for different soil types and groundwater conditions, and a potential shallow groundwater depth will require a specific design that incorporates the site-specific characteristics of the project area. All existing buildings in the Cabin District currently use individual septic systems, and these systems are performing without problems. The details of the septic system have not been designed as yet; NPS engineers will acquire a New Mexico Environment Department Liquid Waste Disposal permit per state regulation 20.7.3, which has specific standards regarding treatment in various soil types and at minimum depths to groundwater. NPS will be following the required regulations for permitting of the system and it will be designed by a qualified engineer, regardless of the depth of the water table.

Comment #8

Commenter asked for mitigation measures for the septic system to treat wastewater.

RESPONSE: The septic system and leach field will be designed to treat the wastewater as per state regulations described above. All other buildings on the Preserve have belowground septic systems, and maintenance staff are already using these systems; hence, their use of septic systems will shift to that of the new garage/maintenance facility. Mitigations for septic system construction are listed in the EA (page 32).

Comment #9

Commenter inquired about the volume of water to be used by the staff in the new garage, and would the existing water resources in the area be sufficient.

RESPONSE: Water for staff in the new building will come from the public water system already established in the Cabin District; this water system will be connected to the new garage building; staff are already using water (in the other buildings), and their use will simply shift to the new garage. Overall impact of the project on hydrology was analyzed and dismissed (pages 4 and 5 in the EA).

Comment #10

Commenter expressed concerns about belowground sulfacants in the septic system and impacts on amphibians.

RESPONSE: The US Fish & Wildlife Service has reviewed the potential impacts of the septic system and concurred that the project "may affect, is not likely to adversely affect, the Jemez

Mountains salamander.” The concurrence letter has been added to the public record on NPS’ Planning, Environment, and Public Comment (PEPC) site for this project.

Comment #11

Commenter inquired about the future location of the photovoltaic solar panels that provide electric power to the all-electric shuttle vans.

RESPONSE: Currently, the solar panels are located on leased property in Jemez Springs, New Mexico. No decision has been made regarding the eventual location of the solar panels, but they do not need to be near the garage; they only need to be connected to the grid, or to a local electrical distribution system and/or battery storage units. Moving the solar panel system is not part of this project and would be a speculative action at this point in time.

Comment #12

Commenter inquired about year-round use of garage area and resulting impacts.

RESPONSE: Winter use of the garage area by NPS staff is already occurring, so no new staff activity impact will result by the construction of the garage.

Comment #13

Commenter asked for additional information on biologists who conducted surveys for endangered species.

RESPONSE: Owl surveys were conducted by trained/certified ornithologists at Los Alamos National Laboratory (Charles Hathcock and colleagues, in 2004, 2005, 2009); songbird surveys have been conducted by ornithologists with Hawks Aloft (Albuquerque, NM) annually since 2012; Surveys for rodents, including the New Mexico meadow jumping mouse, were conducted by NPS biologists in 2008; fish surveys were conducted by biologists with Aquatic Consultants (2003-2007) and New Mexico State University with NPS staff assistance during 2008-2017 (spring and fall surveys).

Comment #14

Commenter asked about the dates of survey for Jemez Mountains Salamander in 2017.

RESPONSE: July 24 and July 31, 2017.

Comment #15

Commenter inquired about costs for operating the new garage facility.

RESPONSE: NPS already is and will be plowing the road from the Entrance Station to the Cabin District, including the spur road to the maintenance area, whether or not the garage is built. Analyses for building operations are not included in EA analyses, as only “social and economic impacts” of the action as it relates to natural or physical environmental effects are included; such is not the case with daily building operations costs; however, utility costs for the building have been incorporated into future Preserve budgets.

Comment #16

Commenter asked if possible future changes in other building use in the Cabin District would constitute cumulative actions that would need to be analyzed.

RESPONSE: Any future changes in building use would be speculative at this point in time, and were not included in the EA analyses. Future building uses are not related to the construction of a garage to shelter shuttle vehicles and provide maintenance staff with indoor work-space. Projects that qualify for “present actions” or “reasonably foreseeable future actions” are those actions which are currently being implemented or, in terms of future actions, those for which there are existing decisions, funding, or proposals and are not highly speculative or indefinite. As such, no present or reasonably foreseeable future actions exist for the Cabin District.

NON-IMPAIRMENT DETERMINATION

REPLACE STORAGE CONTAINERS AND SHED WITH GARAGE/MAINTENANCE BUILDING FOR ELECTRIC-VEHICLE SHUTTLE VANS

ENVIRONMENTAL ASSESSMENT

VALLES CALDERA NATIONAL PRESERVE

APRIL, 2018

By enacting the NPS Organic Act of 1916 (Organic Act), Congress directed the U.S. Department of the Interior and the National Park Service (NPS) to manage units "to conserve the scenery, natural and historic objects, and wild life in the System units and to provide for the enjoyment of the scenery, natural and historic objects, and wild life in such manner and by such means as will leave them unimpaired for the enjoyment of future generations" (54 U.S.C. 100101). NPS *Management Policies 2006*, Section 1.4.4, explains the prohibition on impairment of park resources and values:

"While Congress has given the Service the management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the Park Service must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the Organic Act, establishes the primary responsibility of the National Park Service. It ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them."

An action constitutes impairment when its impacts "harm the integrity of park resources or values, including the opportunities that otherwise will be present for the enjoyment of those resources or values" (NPS 2006, Section 1.4.5). To determine impairment, the NPS must evaluate the "particular resources and values that will be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts. An impact on any park resource or value may constitute impairment, but an impact would be more likely to constitute an impairment to the extent that it affects a resource or value whose conservation is:

- necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park;
- key to the natural or cultural integrity of the park or to opportunities for enjoyment of the park; or

- identified in the park's general management plan or other relevant NPS planning documents as being of significance (NPS 2006, Section 1.4.5).

Fundamental resources and values for Valles Caldera National Preserve are identified in the enabling legislation for the park and the Foundation for Planning and Management Statement. Based on a review of these documents, the fundamental resources and values for Valles Caldera National Preserve come from the Preserve's geologic wonders, the abundant and diverse wildlife, the 10,000-year-old continuum of human history, and providing for the benefit, enjoyment, education, and inspiration of this and future generations. Resources that were carried forward for detailed analysis in the EA are considered necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park; are key to the natural or cultural integrity of the park; and/or are identified as a goal in relevant NPS planning documents. The resource that was carried forward for detailed analysis in this EA was the impact to the Potential Baca Ranch Cabins Historic District. Accordingly, a non-impairment determination is made for this resource. Non-impairment determinations are not necessary for human health and safety or visitor use and experience because impairment findings relate back to park resources and values, and these impact topics are not generally considered park resources or values according to the Organic Act.

This non-impairment determination has been prepared for the selected alternative, as described in the Finding of No Significant Impact, for the Valles Caldera National Preserve's Garage Construction in Cabin District Maintenance Area Environmental Assessment.

Potential Baca Ranch Cabins Historic District

The Cabin District is composed of a cluster of historic cabins dating from the early- to mid- 20th century. At least six of these cabins are considered individually eligible for inclusion on the National Register of Historic Places (NRHP). These cabins and their setting represent structures built by successive owners of the Baca Ranch for habitation and to facilitate ranch management. Preserve staff have prepared a draft nomination for a potential historic district known as the "Baca Ranch Headquarters Area" with a period of significance from 1899–1965. Areas of significance include exploration / settlement, agriculture, transportation, architecture, and conservation. The 43-acre rural landscape is historically part of the 19th century U.S. land grant "Baca Location No. 1". The draft nomination identified nine contributing buildings (log and rustic wood cabins/shelters), one contributing structure (the Bland Route spur road), one contributing site (ruins of the Sheep Barn), and five non-contributing buildings and structures. The surrounding old-growth mixed-conifer trees were included as secondary resources as these stands contribute to the association and setting, and are among the few remaining old growth stands in the Preserve.

The cultural features of the potential historic district line up along the edge of the old-growth ponderosa pine grove, the buildings sheltered and textured by the trees to the northwest but with stunning views of the Valle Grande to the southeast. A historic spur of the old Bland Route road, running generally southwest to northeast along the forest-meadow transition zone, helped establish this linear pattern. The 20th century use of these cabins as a residential area and operations hub, and enjoyment of the historic tree groves by generations of residents and ranch

owners, resulted in the decision to exclude logging here and thus to preserve the old-growth trees as part of a cultural landscape. Extant buildings in the area represent three of the four family ownership eras of the Baca Location No. 1: the Otero Era (1899-1917); the Bond Era (1917-1962); and the Dunigan Era (1964-2000). There are no remaining buildings associated with the 1860 -1899 Baca Era, although the Bland Route spur pre-dates 1898.

From the first surviving log building (the Otero Cabin of 1915) through ongoing improvements prior to the end of the proposed period of significance (1965), these facilities continuously served ranch hands and operations, and have a high degree of integrity in all aspects. All buildings representing the 1915–1965 development period, along with functional and largely compatible post-1965 additions, demonstrate the potential historic district's strong integrity, summarized below.

- Location: The contributing buildings and the Bland Route spur are in their original locations.
- Design: Peeled-log design is predominant today as it was during the period of significance. Board-and-batten additions are compatible with the rustic-log design theme. Each building has a low-scale composition of a few connected rooms fronting onto the Valle Grande.
- Materials: Most exterior materials (peeled-bark logs or rough board-and-batten siding, and machine-milled windows, doors, and rafters) are original.
- Workmanship: Workmanship is evident in the hand-tooled log notching and durable assembly of all building components at a very remote setting with few power tools from 1915 through the early 1960s.
- Setting: The physical environment of the area is relatively intact, including the spatial relationships between features and their placement within the old-growth forest-meadow transition.
- Association: The integrity of design, materials, workmanship and setting enable the association of the district with Baca Location No. 1 sheep and cattle ranching in the early to mid-20th century.
- Feeling: The collection of physical features—natural and cultural—conveys the district's historic character and relate to the strong feeling of ranching in the mountains and meadows of rural New Mexico.

The shuttle van garage and maintenance workshop will be constructed within the potential Baca Ranch Cabin District. The construction will add a non-contributing feature to the district, while removing four non-contributing features (storage units and shed). In addition, construction will include the installation of a septic system, replacement of the underground electric line, and short new trenching to install the waterline and extend the powerline to the main distribution utility pole. Ten small-diameter trees will be removed, along with 2 larger dead snags (hazard trees) for public safety. New gravel will be added to the access road.

NPS has determined that the selected alternative's effect on the Potential Baca Ranch Cabins Historic District will be negligible. The overall visual impact of the project will be reduced by the placement of the garage behind the other buildings in the district and in a location surrounded by existing trees. The impact will be further reduced by the choice of building materials and design that are compatible with the design, association and feeling of the potential district. The septic system and utility lines will all be underground and out of sight; trench-lines will revegetate with herbaceous vegetation within several years and blend in with natural vegetation, and running underground utility lines mostly within existing trench-lines minimizes new areas of disturbance within the landscape of the district. The construction of the garage adjacent to other structures built for storage and maintenance activities will be consistent with the historic use of the area. The proposed garage will not physically alter any contributing feature or cabin in the potential district. Removal of the 10 small trees and 2 snags on the construction site will not alter the structure, functioning, and the feeling of a forested area.

The visual change will not be obvious to the public from the Bond Cabin and other public-access areas along the VC02 road, as other existing trees will mostly screen the project area from view. The project will introduce non-historic audible impacts during garage construction and utility line trenching. Permanent non-historic audible impacts are not expected to differ much from what has occurred in the past. Due to the location and design of the garage, the project will not affect the historical significance of the district, nor change the eligibility of the potential district to be listed on the National Register of Historic Places. In a consultation letter dated May 12, 2017, the NM SHPO stated "[t]he proposed garage, in our view, will fit well in its proposed location [Alternative B] far behind the row of cabins." In a follow-up letter dated November 27, 2017, the NM SHPO further stated it "has no concerns regarding the proposed location or design of the Electric Van Shuttle Garage. The materials and design reflect our earlier recommendations and will minimize impacts to the proposed Baca Ranch Cabin Historic District."

Conclusion

In conclusion, as guided by this analysis, good science and scholarship, advice from subject matter experts and others who have relevant knowledge and experience, and the results of public involvement activities, it is the Superintendent's professional judgment that there will be no impairment of Preserve resources and values from implementation of the selected alternative. The NPS has determined that implementation of the selected alternative will not constitute an impairment of the resources or values of Valles Caldera National Preserve. This conclusion is based on consideration of the Preserve's purpose and significance, a thorough analysis of the environmental impacts described in the EA, comments provided by the public and others, and the professional judgment of the decision maker guided by the direction of NPS *Management Policies 2006*.